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Via ECF

September 4, 2024

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

*Re: In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (GBD)(SN);  
*Ber Barry Aron, et al. v. Islamic Republic of Iran*, No. 1:20-cv-09376  
(GBD)(SN): Non-Economic Damages Judgment for the Estate of Luigi Calvi at  
ECF No. 9931

Dear Judge Netburn:

We write regarding a judgment signed by the Court on June 17, 2024 and entered June 18, 2024 against the Islamic Republic of Iran (“Iran”). ECF No. 9931. As part of that judgment, the Court granted a non-economic damages judgment for the estate of 9/11 victim Luigi Calvi but denied the Estate’s request for economic damages at that time. ECF No. 9931 at 6 (judgment “DENIED in part without prejudice as to Plaintiff Christine Brozon, as Personal Representative of the Estate of Luigi Calvi’s request for pecuniary damages . . . and GRANTED in part in all other respects”). The Estate’s \$2M non-economic damages judgment against Iran though was inadvertently omitted from Exhibit A of the judgment. *Id.* at Exhibit A. On the next business day, June 20, 2024, undersigned counsel alerted the Court to the issue, *see* ECF No. 9954 at n.2, and requested that the Court also enter an economic damages judgment for the Estate. *See generally* ECF No. 9954.

On August 30, 2024, the Court entered an economic damages judgment for the Estate of Luigi Calvi against Iran but did not confirm whether the earlier judgment at ECF No. 9931 included a \$2M non-economic damages for the Estate. ECF No. 10277. In an abundance of caution, we write to confirm that the Court intended to, and in fact did enter a \$2M non-economic damages judgment on behalf of the Estate of Luigi Calvi on June 18, 2024 against the Iran—the same per-estate pain-and-suffering amount that has been entered in favor of every 9/11 victim estate that has obtained a judgment against Iran. Undersigned counsel has attached a Proposed Order hereto confirming this.

**Anderson Kill P.C.**

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We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Jerry Goldman*

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Jerry S. Goldman, Esq.

*Attorney for the Plaintiffs*

Enclosure

Cc (via ECF): The Honorable George B. Daniels  
All MDL Counsels of Record